

APPENDIX A: CODE OF CONDUCT

A1 Background

HDI Gerling Insurance of South Africa Limited (HDI-G SA) adopts the highest standards of corporate conduct and behaviour and in infusing such a culture within HDI-GERLING SOUTH AFRICA has the full commitment of the board of directors, the managing director and all staff members, in conducting the affairs of HDI Gerling Insurance with

- * Integrity, objectivity and independence
- * The requisite competence and technical standards
- * Quality service
- * Professionalism

The managing director and staff of HDI Gerling Insurance ascribe to and practice a documented code of professional conduct.

A2 Introduction

The professional standing of the company is reflected by the calibre of staff it employs.

Employees are a key resource. HDI-GERLING SOUTH AFRICA must recruit high quality individuals, invest in their development, motivate, empower and challenge them, gain their commitment to HDI-G SA's vision, mission, strategies, goals, policies, set standards, objectives and targets as well as having enlightened human resources policies to retain them.

In order to maintain the professional standing of the company, members of staff are required at all times to conduct themselves in accordance with high standards of conduct. The essence of professionalism is an attitude, a commitment to high standards of honorable conduct.

Professional conduct is therefore not only limited to the office environment but also encompass all aspects of one's lifestyle, while considering privacy legislation.

A code of professional conduct expected of employees is embodied in three fundamental principles:

- a) Integrity, objectivity and independence;
- b) Knowledge and skills; and
- c) Professional conduct

a) Integrity, objectivity and independence

ai) Integrity and objectivity

Staff members, in the course of their service to the company offer their services with absolute fidelity and is actuated by a spirit of fairness to all relevant third parties, employer and fellow staff members and by their action, endeavor to enhance the reputation and dignity of the company.

Staff at all times perform their duties with integrity and objectivity. Objectivity refers to one's ability to maintain an impartial attitude in carrying out responsibilities. Integrity is an element

of one's character, which determines the basis of one's actions in a context of ascertainable circumstances.

a ii) Independence

Independence has been defined as the ability to act with objectivity and integrity and being seen to be independent is as important as actually being independent.

Independence is that quality which enables an employee to apply unbiased judgment and objective considerations to establish the facts.

Independence therefore, is ultimately a matter of fact in the circumstances that may also be affected by external appearances.

Staff therefore avoid the danger of their objectivity, not only being impaired, but also appearing to be impaired or subject to doubt by reason of certain relationships.

Certain relationships which could affect or be seen to affect the independence of staff members are the following:

a) Employment of close relatives

Senior staff members ensure that the company's independence is not questioned as a result of the employment of close relatives in their sections.

b) Other close personal involvements

All staff members are encouraged to maintain close business contact and relationships with relevant third parties, (including insured customers) as well as officers of brokers.

It is however, prejudicial if such relationships are, or in the eyes of third parties, appear to be influenced in any way by personal considerations.

c) Gifts

Staff do not accept gifts and hospitality on a scale not commensurate with the normal courtesies of social life. Gifts of a token nature are, however, acceptable.

aiii) Confidentiality

As a general rule, confidential information relating to the company or to its clients is never communicated to anyone outside the company, except when it is in connection with a business transaction or in discussion with company appointed, representatives, lawyers and accountants or other professional advisers in confidence.

In addition, such information is not communicated within the company and to the outside representatives, lawyers and accountants and other professional advisers **only** if the recipient has a legitimate need-to-know and has no responsibilities or duties that are likely to give rise to a conflict of interest and misuse of the information.

All employees are bound by their signed contracts of employment to keep secret the affairs and concerns of the company and its clients during their employment and after they leave the employment of the company.

If employees are in doubt about disclosing company information, department managers and the managing director are contacted in the first instance.

The following confidentiality consent is signed by all employees on joining the company.

Example of confidentiality agreement:

- **Heading: Confidential information**
- The employee shall keep confidential and shall not (except as authorised or required by their duties) use or disclose or attempt to use or disclose to any person any of the secrets and confidential information of the company or any of its associated companies which come to his knowledge during his employment
- The term “secrets and confidential information” extends to all knowledge and information relating to the trade business activities, operations, organisation, finances, processes, dealings, specifications, methods, designs, formulae and technology of and concerning the company and any other group company
- The restriction in sub-clause 1: The above shall apply during and after the termination of the employee’s employment without any time limit but shall cease to apply to information or knowledge which the employee establishes has in its entirety become public knowledge otherwise than through any unauthorised disclosure or other breach on his part of that restriction
- All records documents drawings and other papers including private notes concerning the company and all copies and extracts of them made or acquired by the employee, in the course of her/his employment shall be used for the purposes of the company only and shall be returned to it on demand at any time and without demand on the termination of the employees employment

I hereby agree to abide by the above Confidential Information Clause.

Signed..... Date.....

b) Knowledge and skills

bi) Competence and technical standards

Staff should strive to demonstrate the highest technical competence and quality of service in all areas of responsibility.

bii) Quality service

Work assigned to staff members is carried out competently and expediently.

Such work is also carried out conscientiously so as to provide effective service to the insuring community and to enhance meaningful relationships with brokers and other intermediaries.

biii) Creativity

Creativity is of great importance in HDI-G SA’s culture. It leads to new ideas and their development in visible and practical forms.

c) Professional conduct of staff

ci) Personal conduct

Members of staff conduct themselves in a manner that promotes co-operation, mutual understanding and fosters good relations with relevant third parties and intermediaries alike.

One's conduct is also of such a nature so as to enhance the stature of the company and the insurance industry.

It is also important that one creates a positive and favourable impression.

One of the ways that this can be achieved is by neatness in appearance and dress and by being courteous, tactful and punctual.

cii) Attitude to Work

The interest of the company is placed before individual interests. Departments therefore support and co-operate with each other.

Providing excellent clients services, and achieving internal goals, calls for special qualities in HDI-G SA's employees.

- Involvement with the company's strategic and operational goals and the successful implementation of these;
- An efficient, cost-conscious, co-operative and team-driven style;
- Disciplined work habits, clear performance goals and self-motivation;
- A thorough knowledge of HDI-G SA's markets and products as well as those of HDI-G SA's competitors;
- Competence in performing specific tasks;
- A willingness to keep up with the latest technical and technological developments of HDI-G SA's business.

ciii) Responsibility

Accepting personal responsibility means two things; firstly, to our own conscience, and secondly, in our relations with others. In our business lives, we are primarily concerned with the company's corporate vision, mission, policies and its implementation. Behind that vision and mission are the goals and values in which HDI-GERLING SOUTH AFRICA believes.

Accepting responsibility means letting employees be measured by these values. Each employee has responsibilities:

- To achieve goals and performance tasks, taking cost-conscious decisions and maximising individual performance;
- To show consideration both internally and externally. HDI-GERLING SOUTH AFRICA employees are also our colleagues. HDI-GERLING SOUTH AFRICA clients are also partners;
- Environmental responsibility means the most sparing possible use of natural resources.

Fellow - employees are not criticized unless a duty exists to do so and then only after discussion with the relevant staff member concerned.

Staff conduct themselves in a manner that promotes co-operation and good relations amongst each other.